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| 7 | Attorneys for Walker River Irrigation District | | | |
| 8 | IN THE UNITED STATES DISTRICT COURT | | | |
| 9 | FOR THE DISTRICT OF NEVADA | | | |
| 10 | | | | |
| 11 | UNITED STATES OF AMERICA, |) IN EQUITY NO. C-125-RCJ | | |
| 12 | Plaintiff, |) SUBFILE NO. C-125-C) 3:73-CV-00128-RCJ-WGC | | |
| 13 | |) | | |
| 14 | WALKER RIVER PAIUTE TRIBE, |)) | | |
| 15 | Plaintiff-Intervenor, |)) WALKER RIVER IRRIGATION | | |
| 16 | v. | DISTRICT'S MOTION FOR EXTENSION OF TIME | | |
| 17 18 | WALKER RIVER IRRIGATION DISTRICT, a corporation, et al., | (First Request) | | |
| 19 | Defendants. |)) | | |
| 20 | MINERAL COUNTY, |)) | | |
| 21 22 | Proposed Plaintiff-Intervenor, |)) | | |
| 23 | v. |)) | | |
| 24 | WALKER RIVER IRRIGATION DISTRICT, et al., | ,)) | | |
| 25 | Proposed Defendants. |) | | |
| 26 | | ,) | | |
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Pursuant to Fed. R. Civ. P. 6(b) and LR 6-2, the Walker River Irrigation District ("District") moves the Court for an order extending the time for all parties to file replies in support of the Motion to Dismiss filed herein on March 31, 2014 (Dkt. 751) until a date which is 30 days after the United States of America files its Response in Opposition to the Motions to Dismiss filed in Subproceeding C-125-B. The following grounds are presented in support of this Motion:

- 1. The Court ordered that motions to dismiss on jurisdictional grounds be filed by March 31, 2014, with responses due May 30, 2014 and replies due June 30, 2014. (Dkt. 736).
 - 2. The Motion to Dismiss was filed on March 31, 2014. (Dkt. 751).
- 3. By Order filed May 27, 2014, the United States Court of Appeals for the Ninth Circuit stayed the deadline for the United States to file a response to the Motions to Dismiss in Subproceeding C-125-B pending disposition of the Petition for Writ of Mandamus filed in the Ninth Circuit by the United States of America.
- The Ninth Circuit Court of Appeals has not yet disposed of the United States'
 Petition for Writ of Mandamus.
- 5. On May 30, 2014, Mineral County filed its response to the Motion to Dismiss in this matter (Dkt. 759), and on that same date, the Walker River Paiute Tribe filed its response in opposition to Motions to Dismiss (Dkt. 758).
- 6. The United States filed a response to the Motion to Dismiss on June 2, 2014. (Dkt. 760). However, that response does not address all of the issues raised by the Motions to Dismiss filed in Subproceeding C-125-B.
- 7. The United States has not filed a response to the Motions to Dismiss in Subproceeding C-125-B, and likely will not file a response until the Ninth Circuit Court of Appeals disposes of its pending Petition for Writ of Mandamus and lifts its stay.

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| 1 | 8. Pursuant to the Court's Order, replies in support of the Motion to Dismiss a | are | |
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| 2 | due herein on June 30, 2014 (Dkt. 736). | | |
| 3 | 9. There is a jurisdictional issue raised by the Motion to Dismiss here which | ıis | |
| 4 | common to one of the jurisdictional issues raised in Subproceeding C-125-B. | | |
| 5 6 | 10. The District has filed a similar Motion for Extension of Time in Subproceedin | | |
| 7 | C-125-B. | | |
| 8 | 11. An extension of time in both Subproceedings C-125-B and C-125-C wor | uld | |
| 9 | allow the briefing and decision on the Motions to Dismiss filed in both Subproceedings to | | |
| 10 | proceed simultaneously, consistent with the preference previously expressed by the Court, and | | |
| 11 | will keep the schedules for the Motions to Dismiss in both Subproceedings the same, all o | | |
| 12 | which is in the interest of judicial economy and efficiency. | | |
| 13 | THEREFORE, the Walker River Irrigation District requests that the Court extend the | | |
| 14 15 | time for all parties to file replies in support of the Motion to Dismiss herein to a date which is | | |
| 16 | 30 days after the United States files its response in opposition to the Motions to Dismis | | |
| 17 | Subproceeding C-125-B. | | |
| 18 | Dated: June 6, 2014. | | |
| 19 | WOODBURN AND WEDGE | | |
| 20 | | | |
| 21 | By: /s/ Gordon H. DePaoli | | |
| 22 | Gordon H. DePaoli, Dale E. Ferguson, Domenico R. DePaoli | | |
| 23 24 | 6100 Neil Road, Suite 500 Reno, Nevada 89511 | | |
| 25 | Attorneys for Walker River Irrigation District | | |
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CERTIFICATE OF SERVICE 1 2 I certify that I am an employee of Woodburn and Wedge and that on the 6th day of 3 June, 2014, I electronically served the foregoing with the Clerk of the Court using the CM/ECF 4 system, which will send notification of such filing to the following via their email addresses: 5 Bryan L. Stockton bstockton@ag.nv.gov 6 K Geddes kgeddes@water.nv.gov sgeyer@ag.nv.gov S. Gever 7 Don Springmeyer dspringmeyer@wrslawyers.com cmixson@wrslawyers.com Christopher Mixson 8 crehfeld@wrslawyers.com C. Rehfeld 9 nvaldez@wrslawyers.com N. Valdez George Benesch gbenesch@att.net 10 Greg Addington greg.addington@usdoj.gov Elizabeth Pantner epantner@usdoj.gov 11 joanie.silvershield@usdoj.gov Joanie Silvershield James Spoo spootoo@aol.com 12 jjrbau@hotmail.com J. J. Rbau 13 John Paul Schlegelmilch ipslaw@netscape.com kpeterson@allisonmackenzie.com Karen Peterson 14 nfontonet@allisonmackenzie.com N. Fontonet voneill@allisonmackenzie.com V. O'Neill 15 Laura Schroeder counsel@water-law.com T. Jackson t.jackson@water-law.com 16 tau@water-law.com Tau 17 madams@ag.nv.gov Marta A. Adams karmstsrong@ag.nv.gov K. Armstrong 18 L. Deming ldeming@ag.nv.gov vbrownell@ag.nv.gov V. Brownell 19 vborwnley@ag.nv.gov V. Brownley mhoy@nevadalaw.com Michael D. Hoy 20 K. Anderson kanderson@nevadalaw.com 21 M. Kimmel mkimmel@nevadalaw.com T. Chrissinger tchrissinger@nevadalaw.com 22 Ross E. de Lipkau ecf@parsonsbehle.com rtinnell@parsonsbehle.com R. Tinnell 23 Thomas J. Hall tjhall@eschelon.com michael.neville@doj.ca.gov Michael W. Neville 24 annadel.almendras@doj.ca.gov **Annadel Almendras** 25 Joan Randolph joan.randolph@doj.ca.gov **Stacey Simon** ssimon@mono.ca.gov 26 Stephen M. Macfarlane Stephen.Macfarlane@usdoj.gov Deedee Sparks deedee.sparks@usdoj.gov 27 Cathy Wilson cathy.wilson@bia.gov

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